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Attorneys for Defendant TRAVELERS INDEMNITY  
COMPANY OF CONNECTICUT

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

THE MICHEL FAMILY TRUST,

Plaintiff,

vs.

TRAVELERS INDEMNITY COMPANY  
OF CONNECTICUT, THE TRAVELERS  
INDEMNITY COMPANY, and DOES 1 to  
100, inclusive,

Defendants.

**CASE NO. C09-04144 PVT**

**STIPULATION TO SUBMIT JOINT  
STATEMENT OF UNDISPUTED FACTS  
WITH MOTION FOR SUMMARY  
JUDGMENT AND REQUEST TO  
ALLOW THE MOTION TO EXCEED 25  
PAGES;**

|XXXXXXXXXXXXX| **ORDER THEREON**

TO THE HONORABLE PATRICIA V. TRUMBULL, U.S. DISTRICT COURT MAGISTRATE  
JUDGE:

**STIPULATION**

WHEREAS, Plaintiff MICHEL FAMILY TRUST and Defendant TRAVELERS  
INDEMNITY COMPANY OF CONNECTICUT ("Travelers") have met and conferred and have  
agreed that certain facts in this litigation are undisputed and certain documents have been  
authenticated and are admissible as evidence, for purposes of Travelers' Motion for Summary  
Judgment only;

NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff  
MICHEL FAMILY TRUST and Defendant TRAVELERS INDEMNITY COMPANY OF

CONNECTICUT hereby stipulate that, pursuant to Local Rule 56-2, the parties be allowed to file a Joint Statement of Undisputed Facts, with Exhibits, for use in supporting and opposing Travelers' Motion for Summary Judgment.

**REQUEST BY TRAVELERS TO EXCEED 25-PAGE LIMIT**

Because the undisputed facts in this matter are lengthy, Travelers respectfully requests that the Court permit it to file a motion for summary judgment that exceeds the 25-page limit set by Local Rule 7-2 by no more than seven pages, such that the motion shall be no longer than 32 pages.

Respectfully submitted,

DATED: August 11, 2010

**FORAN GLENNON PALANDECH PONZI &  
RUDLOFF PC**

By: /s/ Kathleen M. DeLaney  
Kathleen M. DeLaney

Attorneys for Defendant  
**TRAVELERS INDEMNITY COMPANY OF  
CONNECTICUT**

DATED: August 11, 2010

**WILLIAMS, PINELLI & CULLEN, LLP**

By: /s/ Amy Carlson  
Amy Carlson

Attorneys for Plaintiff  
**MICHEL FAMILY TRUST**

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**ORDER**

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, that on or before August 17, 2010, the parties may file a Joint Statement of Undisputed Facts, with Exhibits, for use in supporting and opposing Travelers' Motion for Summary Judgment.

IT IS FURTHER ORDERED that Travelers' Motion for Summary Judgment may be up to 32 pages in length.

Date: August 12, 2010



PATRICIA V. TRUMBULL  
UNITED STATES MAGISTRATE JUDGE

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